

**O S B O R N L A W, p.c.**  
**43 West 43<sup>rd</sup> Street, Suite 131**  
**New York, New York 10036**

DANIEL A. OSBORN  
LINDSAY M. TRUST

TELEPHONE  
212 - 725 - 9800

FACSIMILE  
212 - 500 - 5115

March 30, 2021

**VIA ECF**

Honorable Debra Freeman  
United States District Magistrate Judge  
United States District Court  
500 Pearl Street  
New York, New York 11201

Re: *Segarra v. Commissioner of Social Security*,  
Civil Action No. 1:20-cv-05801-PGG-DCF

Dear Judge Freeman,

We write on behalf of plaintiff, Iris Segarra, and with the consent of the defendant, to request a 60-day extension of time to file plaintiff's motion for judgment on the pleadings. Plaintiff's motion is due on March 30, 2021. Plaintiff respectfully requests an extension of time up to and including May 29, 2021. This is plaintiff's first request for an extension of time.

The parties have exchanged written contentions expressing their respective positions regarding a possible remand. The parties were not able to reach an agreement.

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Subject to the approval of the Court, the parties propose the following revised briefing schedule:

- a. Plaintiff to file her motion for judgment on the pleadings on or before **May 29, 2021**;
- b. Defendant to file its response/cross-motion on or before **July 28, 2021**; and
- c. Plaintiff to file her reply (if any) on or before **August 18, 2021**.

Thank you for your consideration of this request.

Respectfully submitted,

s/Daniel A. Osborn  
Daniel A. Osborn

cc: Nahid Sorooshyari, Esq. (by ECF)

The proposed briefing schedule is adopted.  
No further extensions.

SO ORDERED

  
DEBRA FREEMAN  
United States Magistrate Judge

Dated: 4/3/2021